

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

THEODORE J. FOLKMAN,

Plaintiff,

vs.

US DEPARTMENT OF STATE,

Defendant

Civ. A. No. 13-10614-RWZ

**PLAINTIFF'S MOTION FOR LEAVE
TO SERVE A SUPPLEMENTAL PLEADING**

Pursuant to Fed. R. Civ. P. 15(d), the plaintiff, Theodore J. Folkman, moves for leave to serve a supplemental complaint and for an order requiring the defendant to answer the supplemental complaint within thirty days of service. The proposed supplemental complaint is attached to this motion as Exhibit 1. A memorandum of law and a declaration are being filed with this motion.

REQUEST FOR ORAL ARGUMENT

Pursuant to L.R. 7.1(d), the plaintiff requests oral argument.

Respectfully submitted,

/s/ Theodore J. Folkman
Theodore J. Folkman (BBO No. 647642)
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Pro se

Dated: July 16, 2014

LOCAL RULE 7.1 CERTIFICATE

I certify that on June 25, 2014, I conferred with counsel for the defendant in a good-faith attempt to resolve or narrow the issue.

/s/ Theodore J. Folkman

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the NEF and paper copies will be sent to those indicated as non-registered participants on July 16, 2014.

/s/ Theodore J. Folkman

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